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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CAROL-LYN LIDDLE, an individual,
Plaintiff,

v.

HARRY COWELL, an individual; ROCK
VAULT TOURS, INC., a Delaware
Corporation; DOE individuals 1 through 10;
and ROE business entities 11 through 20,
Defendants.

Case No. 2-18-cv-00918-RFB-PAL

**STIPULATION TO DISMISS WITH
PREJUDICE**

Whereas, on May 18, 2018, Plaintiff Carol-Lyn Liddle (“Plaintiff”) filed a Complaint [ECF No. 1] against Defendants Harry Cowell and Rock Vault Tours, Inc. (collectively “Defendants”) which alleged claims for: sexual harassment – hostile work environment, violation of NRS 613, gender and age discrimination, breach of contract, and intentional infliction of emotional distress;

Whereas, on February 6, 2019, Plaintiff filed a First Amended Complaint [ECF No. 35], which retained each claim alleged in the Complaint and added an alleged claim for retaliation and tortious interference;

Whereas, on May 24, 2019 Plaintiff filed a stipulated notice to voluntarily dismiss with prejudice each of her claims against Defendants except the breach of contract claim;

1 **Now therefore**, Plaintiff Carol-Lyn Liddle, by and through her attorneys of record, the
2 Rodriguez Law Offices, P.C., and Defendants Harry Cowell and Rock Vault Tours, Inc., by and
3 through their attorneys of record, Holland & Hart LLP, hereby stipulate and respectfully request
4 the Court dismiss Plaintiff's breach of contract claim with prejudice and order that this matter,
5 Case Number 2-18-cv-00918-RFB-PAL and the Complaint [ECF No. 1] and the First Amended
6 Complaint [ECF No. 35] therein be dismissed in their entirety with prejudice.

7 The Parties further stipulate that the parties will bear their respective attorneys' fees and
8 costs incurred with respect to this dispute.

9
10 Dated: May 29, 2019.

Dated: May 29, 2019.

11 Respectfully submitted,

Respectfully submitted,

12 /s/ Esther C. Rodriguez
13 Esther C. Rodriguez, Esq.
14 Rodriguez Law Offices, P.C.

/s/ Matthew T. Cecil
Matthew T. Cecil, Esq.
Holland & Hart, LLP

15 Attorneys for Plaintiff

Attorneys for Defendants

16
17 **ORDER**

18 **IT IS SO ORDERED.**

19
20 
21 RICHARD F. BOULWARE, II
22 UNITED STATES DISTRICT JUDGE

23 DATED this 31st day of May, 2019.